

CAROLINE D. CIRAULO
Principal Deputy Assistant Attorney General

VIRGINIA CRONAN LOWE
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
Ben Franklin Station
Washington, D.C. 20044-0683
Telephone: (202) 307-6484
Facsimile: (202) 307-0054
Virginiacronan.lowe@usdoj.gov

DANIEL G. BOGDEN
United States Attorney
Of Counsel

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

WELLS FARGO BANK, N.A., Executor of
the Estate of Roy Frank McKoy; ANDREW
NOLL, Trust Officer, Wells Fargo Bank, N.A.,

Defendants.

CIVIL No. 2:16-cv-00628 RFB-GWF

JOINT MOTION TO STAY AND
~~Proposed~~ ORDER
(Third Request Regarding Deadline to
Answer)

COMES NOW the United States of America and defendants Wells Fargo Bank, N.A. and
Andrew Noll, by and through their undersigned attorneys, and stipulate as follows:

1. Defendant Wells Fargo Bank, N.A. and defendant Andrew Noll were served with a
summons and copy of the Complaint in this matter on June 7, 2016 and June 17, 2016,
respectively. Pursuant to an Orders (Docs. 5 and 7) entered on June 28, 2016 and August 15,

2016, the time in which the defendants must respond to the Complaint was extended until October 28, 2016.

2. The parties are continuing with discussions and an exchange of documents regarding a resolution of this matter. In addition, the defendants are seeking instructions with regard to the Estate of Frank McKoy in the District Court, Clark County, Nevada. In order to continue these discussions without incurring additional fees the parties request that the deadlines in this case, including the time in which the defendants must respond to the Complaint be stayed and the parties be required to file a status report in seventy days or by January 6, 2017

3. This motion is not meant for delay but to allow the parties additional time to continue discussions in an effort to resolve this matter without incurring additional costs and expenses.

WHEREFORE, the parties respectfully request that the case be stayed and a status report be filed by January 6, 2017.

Respectfully submitted this 20th day of October, 2016.

CAROLINE D. CIRAULO
Principal Deputy Assistant Attorney General

/s/ Virginia Cronan Lowe
VIRGINIA CRONAN LOWE
Trial Attorney, Tax Division
U.S. Department of Justice

DANIEL G. BOGDEN
United States Attorney
Of Counsel

Attorneys for the United States of America


FENNEMORE CRAIG

/s/ Bradley Richardson
BRADLEY RICHARDSON
300 S. Fourth Street, Suite 1400
Las Vegas, NV 89101
Telephone: (702)692-8000

Attorneys for Defendants

IT IS SO ORDERED.

Dated: October 21, 2016


GEORGE W. FOLEY
United States Magistrate Judge